

JAP:AL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-1460

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

CECILE TAMARA OLIVER,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

PAUL NUGENT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about December 8, 2010, within the Eastern District of New York and elsewhere, defendant CECILE TAMARA OLIVER did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about December 8, 2010, CECILE TAMARA OLIVER (the "defendant") arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard American Airlines flight 660 from St. Martin.

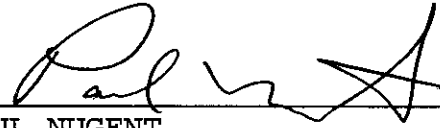
2. The defendant was selected for a Customs and Border Protection ("CBP") secondary examination. The defendant was in possession of a black suitcase. The defendant stated, in substance, that the suitcase and its contents belonged to her.

3. A CBP officer found three yellow packages in the suitcase. The defendant stated that the packages contained flour. However, the packages were labeled "corn meal." A CBP officer probed one of the packages and found that it contained a white, powdery substance. The substance was field-tested and found to contain cocaine.

4. The total approximate gross weight of the cocaine found in the defendant's suitcase is 3,014.5 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
Defendant CECILE TAMARA OLIVER be dealt with according to law.



PAUL NUGENT
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
9th day of December, 2010
